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BEFORE THE ARIZONA CORPORATION COMMISSION

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MIKE GLEASON  
KRISTIN K. MAYES

2004 AUG -2 P 4: 12 Arizona Corporation Commission

DOCKETED

AUG 02 2004

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IN THE MATTER OF THE NOTICE OF  
PROPOSED RULE MAKING REGARDING  
THE TRANSPORTATION OF NATURAL  
GAS, OTHER GASES AND HAZARDOUS  
LIQUIDS BY PIPELINES

DOCKET NO. RG-00000A-04-0169

UNS GAS, INC. COMMENTS

UNS Gas, Inc. hereby submits its comments related to Staff's proposed amendments to the Arizona Corporation Commission's (Commission) Pipeline Safety Rules, A.A.C. R14-5-202 through A.A.C. R14-5-205. UNS Gas generally supports the proposed amendments, and is only commenting on one section, R14-5-202(S).

In this section, the proposed rule states that an operator must report a pipe failure to the Commission's Office of Pipeline Safety. For clarification purposes, UNS Gas proposes that the following language be added to R14-5-202(S)(1):

If an operator of an intrastate natural gas, other gas, or hazardous liquid pipeline removes a portion of a pipeline that failed for any reason other than observable external corrosion or third party damage, improper installation, poor workmanship, and manufacturing defect, the operator shall retain the portion that was removed and shall notify the Office of Pipeline Safety of the removal within two hours after the removal is complete.

UNS Gas believes that this additional language will provide clarity as to the types of failures that do not need to be reported to the Commission Office of Pipeline Safety.

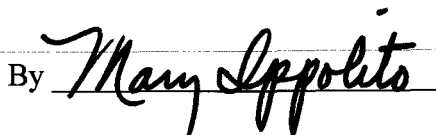
1 RESPECTFULLY SUBMITTED this 2nd day of August 2004.

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10 ORIGINAL + 15 COPIES of the foregoing  
11 filed August 2<sup>nd</sup>, 2004, with:

12 Docket Control  
13 ARIZONA CORPORATION COMMISSION  
14 1200 West Washington  
15 Phoenix, Arizona 85007

16 By 

17 Copy of the foregoing hand-delivered/mailed  
18 August 2, 2004 to:

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To all Parties in the Docket